

UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF SOUTH CAROLINA
COLUMBIA DIVISION

BRIAN BOWEN, II,)	C/A No.: 3:18-cv-3118-JFA
)	Hon. Joseph F. Anderson, Jr.
Plaintiff,)	
)	
vs.)	
)	
ADIDAS AMERICA, INC.;)	DEFENDANT, CHRISTIAN DAWKINS'
JAMES GATTO; MERL CODE;)	RULE 26(a)(1) INITIAL DISCLOSURES
CHRISTIAN DAWKINS; MUNISH)	
SOOD; THOMAS GASSNOLA; and)	
CHRISTOPHER RIVERS,)	
)	
Defendants.)	
)	

Pursuant to Fed. R. Civ. P. 26(a)(1), Defendant, Christian Dawkins (“Dawkins”), by and through his undersigned counsel, hereby provides the following information:

(A)(i) The name and, if known, the address and telephone number of each individual likely to have discoverable information - along with the subjects of that information - that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

1. Dawkins references and adopts the witnesses listed in Paragraph A.1, and A.2 (a)(b)(c)(h)(i) and (j) from the Adidas America, Inc. Disclosure.
2. Plaintiff, Brian Bowen, Jr. - Plaintiff is believed to have knowledge of facts related to the allegations of the Amended Complaint.
3. Third Party Defendant, Brian Bowen, Sr. - Upon information and belief, Brian Bowen, Sr. has knowledge of the facts related to the allegations of the Amended Complaint.
4. All named Co-Defendants in the above-captioned litigation - Upon information and belief, the Co-Defendants named in this litigation have knowledge of the facts related to the allegations of the Amended Complaint.

5. Any other persons or entities listed by any party in this case as having knowledge of the claims or defenses or subject matter of this action or as a witness or identified by any party in filings or discovery responses. Upon information and belief, those persons or entities will have the knowledge as indicated by such parties.

(A)(ii) A copy - or a description by category and location - of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Dawkins has email correspondences with Brian Bowen, Jr. and Brian Bowen, Sr., as well as numerous other third parties who were paying Brian Bowen, Sr. for the amateur basketball services of his son, which will be used to support numerous claims that Brian Bowen, Sr. sold his son at a very young age to the highest amateur basketball bidders, ruining his son's status as an amateur basketball player and essentially committing the crime of Wire Fraud, as defined by the Southern District of New York.

Dawkins further has emails, phone records and other tangible evidence in support of the above-entitled reality of the actions of the Bowen family, including correspondences with the mother of Brian Bowen, Jr.

(A)(iii) A computation of any category of damages claimed by the disclosing party - whole much also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

Dawkins has not yet asserted a claim for damages in the above-captioned litigation but reserved his right to do so. Dawkins denies liability for any damages to Plaintiff.

(A)(iv) For inspection and copying under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment

Dawkins is not in possession of any such insurance agreement.

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Dated: October 13, 2020

PROOF OF SERVICE

I hereby certify that on October 13, 2020, I served Defendant, Christian Dawkins Initial Disclosures and this Certificate of Service to all counsel of record to their respective email(s).

Respectfully submitted,
/s/ Steven A. Haney
Counsel for Defendant, Chrisian Dawkins